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July 27, 2018

**By ECF**

The Honorable Katherine H. Parker  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Daniel Kleeberg et al. v. Lester Eber et al.*, 1:16-cv-09517-LAK-KHP  
**Letter Motion Requesting Extension of Deadlines**

Dear Judge Parker,

This firm represents the Plaintiffs in the above-named matter. I write to request that the Court permit Plaintiffs to file their intended Motion to Compel the Eber Defendants to Produce Discovery Being Withheld on Privilege Grounds on or before 12:00 PM on Sunday, July 29, 2018. The Eber Defendants advised this evening that they consent to this request.

Pursuant to the May 30, 2018 Scheduling Order, Plaintiffs' Motion is due today. Good cause exists to extend the deadline. Among other things, the Eber Defendants produced amended discovery responses only yesterday afternoon. In addition, due to my own misunderstanding, I did not appreciate until very late in the drafting process that the Eber Defendants had produced four separate privilege logs, with different entries for each document production date. Rather than file incomplete and sloppy briefing on this important issue, we decided to request an extension into the weekend so that we could combine and carefully parse the various logs.

As a condition of their consent, the Eber Defendants request a similar extension of the deadline for their Opposition, such that it be due on or before noon on Sunday, August 19, 2018. To avoid any potential prejudice to the Court's timetable for rendering a decision, Plaintiffs do not request additional time for their Reply, which will remain due on or before August 24, 2018.

We thank the Court for its attention to this matter.

Respectfully submitted,



Brian C. Brook

cc: Paul F. Keneally, Esq.